

REMARKS

The office action dated March 29, 2004 has been carefully reviewed, together with the prior art patents that have been cited and applied in the rejections. The specification has been amended to correct an obvious misstatement regarding the operation of the present invention, with the single correction being made to conform to the flow chart shown in Fig. 2. The examiner has rejected all claims based upon MacLeod in view of Fontaine and further in view of applicants' purported admitted prior art or that same combination with the addition of the C++ website for the rejection of claim 9.

Applicants traverse the rejection of claims 1-8 and 10-11 for several reasons. Neither MacLeod nor Fontaine, applied singularly or in combination with one another, are believed to teach or suggest these claims. More particularly with respect to claim 1, these references fail to teach a method for generating a configuration database file based on at least one data file of at least one ECAD tool included in a predefined tool list that comprises the steps of selecting an ECAD tool from the predefined tool list, reading a data file of said selected ECAD tool and generating a configuration database file based on said read data file.

Of the three steps of this claimed method, the examiner admits that MacLeod does not teach or suggest the selecting or reading step. Moreover, the examiner admits that MacLeod does not explicitly disclose that the generated database is an ECAD configuration database and does not explicitly disclose that the object is an ECAD tool. Since the examiner admits that MacLeod is not directed to a method

of generating a configuration database file based on at least one data file or at least one ECAD tool included in a predefined tool list and does not teach or suggest the selecting or reading steps, it is difficult to understand how this patent can provide a basis for an obviousness rejection. More particularly, MacLeod is directed to a system for building giant data warehouses where data is imported from multiple databases and record file stores that are common in large corporations, with the apparatus being directed to a single “data pump” application environment which allows developers to specify the import, transformation and export of data to a desired destination location, all on a streaming, contiguous basis. This characterization is set forth in the Summary of the Invention at column 2, lines 54-58.

The MacLeod apparatus also utilizes data interface drivers to process different types of source data so that it can be converted to a relational tabular format. Clearly, the MacLeod apparatus is directed to converting and integrating data from a variety of database locations and applications that require multiple data conversions to take place (column 2, lines 4-7). This is far afield from the art of electronic computer aided design systems and tools which are used to design electronic circuits, particularly providing a user with a set of software tools running on a digital computer with a graphic display device that is used to design integrated circuits. It is clear that the examiner has completely ignored the claim language of claim 1 which clearly indicates that the method as claimed involves an ECAD tool as stated in the preamble and two of the specific steps are defined in terms of an ECAD tool. In fact, all of the claims, both independent and dependent specifically state that they relate to configuration database files that are for at least one ECAD tool.

It is submitted that one of ordinary skill in the art of ECAD tools would not be directed to the MacLeod patent for the reason that it has nothing to do with ECAD tools and in fact is concerned with building a data warehouse of data from a variety of database locations and applications, all of which must be converted to be imported into the warehouse. The examiner states that MacLeod discloses a generic database generator application that takes multiple files, finds a driver that matches the files type and then uses the driver to load the file into a database. Even assuming the examiner's characterization of MacLeod is accurate, it has little to do with what is claimed in claim 1 conversion of data from a variety of database locations for importation into a data warehouse has nothing to do with generating a configuration database for operating an ECAD tool.

After the examiner's admission on page 3 that MacLeod does not disclose the preamble of applicants' claim 1 method or perform the selecting or reading steps, the examiner states that Fontaine purports to supply the deficiencies of MacLeod. Applicants' dispute this contention. Fontaine also has nothing to do with ECAD tools or generating a configuration database for such an ECAD tool. Fontaine in its summary of the invention is stated to provide an improved technique for organizing, storing, recalling and correlating information for document generation. The system has a plurality of information objects that are defined, generated and stored, with the objects containing data or text common to one or more documents. A master file for each document with references to specific information objects is correspondingly defined, generated and stored. The information objects may also contain references to other information objects and may also be organized into source

files. The system also states that writing tools are editors, text formatters, text processors, graphic processors and document previewers. These are not ECAD tools or anything close to them. Fontaine is concerned with providing a system to easily generate user, installation or troubleshooting manuals specific to products and uses common language that may be utilized in manuals for various models or versions of products in a manner that is less costly because data or text common to one or more documents can be separately defined, generated and stored. It has nothing to do with providing a configuration database file for ECAD tools or users.

MacLeod and Fontaine are directed to vastly different arts that one of ordinary skill in the ECAD tool art would not believe would be relevant. Moreover, not only would one of ordinary skill in the ECAD tool art not be inclined to refer to either of these patents for guidance, there is also no motivation contained in either MacLeod or Fontaine to combine one with the other. The manner in which the examiner has gleaned bits and pieces from these two references clearly demonstrate that the claims have been used as a roadmap to attempt to reconstruct the claimed invention which is an improper practice of hindsight reconstruction that has been condemned by the Court of Appeals for the Federal Circuit in many of its decisions. Not only does MacLeod fail to teach or suggest the claimed invention, but Fontaine does not supply the many deficiencies of MacLeod.

The applicants' dispute that the "data interface drivers" of MacLeod are analogous to the "information objects" of Fontaine. This is pure speculation and is logically implausible. The examiner also states that it would have been obvious to a person of ordinary skill in the art to optimize the database generator of MacLeod by

ordering the loading and tool order as disclosed by Fontaine and that the motivation to apply said optimization is suggested by Fontaine. This is pure speculation that is not supported by either MacLeod or Fontaine. The examiner also states that it would have been further obvious to a person having ordinary skill in the art to substitute the ECAD files for the input data sources of MacLeod and the ECAD tools of the purported admitted prior art for the data interface drivers of MacLeod in the modified database generator of MacLeod and Fontaine in combination. This is also pure speculation and is not supported by MacLeod, Fontaine or the purported admitted prior art.

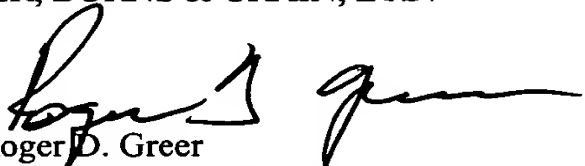
For the foregoing reasons, claim 1 is neither taught nor suggested by the prior art that has been applied and reconsideration and allowance of this claim is respectfully requested. Moreover, because the arguments that have been made with regard to claim 1 also apply to the computer system of claim 10, as well as the computer program product of claim 11, reconsideration and allowance of these claims is respectfully requested.

Since the dependent claims necessarily include the subject matter of the claims from which they depend in addition to reciting other features and/or functionality not found in those claims, reconsideration and allowance of the dependent claims is also respectfully requested.

Respectfully submitted,

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